

EXHIBIT G

Deposition of Nancy Halliday

Rachel Volkel v. Smithtown Gospel Tabernacle and Camp Cherith in the Adirondacks

1

SUPREME COURT OF THE STATE OF NEW YORK

2

COUNTY OF SUFFOLK

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ORIGINAL

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RACHEL VOLKEL,

5

Plaintiff,

6

v.

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SMITHTOWN GOSPEL TABERNACLE and CAMP
CHERITH IN THE ADIRONDACKS, INC. d/b/a
CAMP CEDARBROOK IN THE ADIRONDACKS, INC.,

9

Defendants. Index: 619658/2019

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REMOTE DEPOSITION OF NANCY HALLIDAY

13

AUGUST 29, 2022

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REMOTE DEPOSITION OF NANCY HALLIDAY taken via

17

Zoom in the above-styled and numbered cause on August 29,

18

2022, commencing at 10:00 a.m. Eastern Standard Time, before

19

Gina Williams, Registered Professional Reporter, Certified

20

Realtime Reporter, and Certified Realtime Captioner.

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1 A P P E A R A N C E S

2

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11 By: PATRICK ARGENTO, ESQUIRE

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13 On behalf of Defendant Smithtown Gospel Tabernacle:

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19 LEGAL VIDEO TECHNICIAN: MATT MESSNER

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QUOTATION MARKS ARE USED FOR CLARITY AND DO NOT
NECESSARILY REFLECT A DIRECT QUOTE

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E X H I B I T S

10 Number

11 (None marked)

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1 WHEREUPON,

2 NANCY HALLIDAY

3 was called as a witness and, after having been first duly
4 sworn, was deposed and testified as follows:

5 EXAMINATION

6 BY MS. NAPPI:

7 Q Good morning, Ms. Halliday. My name is Hillary
8 Nappi. I'm a lawyer with Hach Rose Schirippa & Cheverie,
9 and I represent the Plaintiff Rachel Volkel in this lawsuit.
10 Nice to meet you, and I appreciate it.

11 Have you ever been deposed before, ma'am?

12 A No, I have not.

13 Q So I'm just going to go through a couple of rules
14 so that we can kind of make this be as efficient for
15 everyone as possible.

16 So, first of all, you understand that you took an
17 oath; correct?

18 A Correct.

19 Q Do you understand that this is the same oath that
20 you would take in a courtroom?

21 A Yes.

22 Q Okay. Good.

23 So if you don't hear me or you don't understand a
24 question that I ask you, you can feel free to ask me to
25 repeat that, and I will.

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1 If you answer a question that I've asked you
2 without telling me that you didn't understand it or that you
3 didn't hear me, I'm going to assume that you understood the
4 question and that your answer is based on the question that
5 I asked.

6 A Okay.

7 Q If at any point you need to take a break, you
8 need water, the bathroom, to use your phone, that's
9 completely fine. Please just let me know, and we can do
10 that, but I'm just going to ask that you answer the question
11 that is pending before we take that break, okay?

12 A Sure.

13 Q You're doing wonderful with this, but I'm going
14 to ask that your answers be audible because Gina is taking
15 them down for a transcript, so we want to make sure that we
16 hear you.

17 So if you shake your head or wave your hand or
18 say "uh-huh," she's not going to be able to get that down.

19 A Okay.

20 Q The last one is hard since we're on Zoom and not
21 in person, and I'm going to apologize in advance and do my
22 best to not speak over you. So even if you can anticipate
23 the question that I'm asking you, please let me finish it
24 first before you answer, and I will do my absolute best to
25 let you finish your answer before I ask another question,

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1 okay?

2 A Okay.

3 Q Great. So just for the record, what's your full
4 legal name, ma'am?

5 A Nancy Elizabeth Halliday.

6 Q And in what state and county do you reside?

7 A I live in New York State in Suffolk County.

8 Q And are you under the influence of any drugs or
9 alcohol that could impact your ability to testify today?

10 A No.

11 Q Have you ever used any other legal names, ma'am?

12 A No.

13 Q And I have to ask. I don't mean to insult you.

14 Have you ever been arrested, ma'am?

15 A No.

16 Q So you've never been convicted of a crime;
17 correct?

18 A No.

19 That's correct.

20 Q Thank you for that.

21 How did you prepare for today's deposition?

22 A I had a conversation with our lawyer.

23 Q Okay. And without telling me what you spoke to
24 your lawyer about, did you prepare in any other way, ma'am?

25 A No.

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1 Q Today as we take your deposition, where are you
2 located?

3 A At home in my home office.

4 Q Is anyone present in the room with you?

5 A No.

6 Q What device are you using to attend the
7 deposition today?

8 A I'm using my iPhone.

9 Q Do you have any documents in front of you, ma'am?

10 A No.

11 I have a pad to take notes.

12 Q Okay. Is there anything written on that notepad
13 right now?

14 A Just some notes from my conversation with the
15 lawyer.

16 Q Okay. I'm going to ask you to preserve that
17 piece of paper and take a screen shot or a picture of it and
18 send it to your lawyer.

19 MS. NAPPI: And Patrick, after your review, we're
20 going to demand a copy of that.

21 MR. ARGENTO: Note my objection, but I'll look at
22 it.

23 MS. NAPPI: Thank you.

24 BY MS. NAPPI:

25 Q Do you have any windows or other screens open on

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1 any other device or on your phone, ma'am?

2 A My phone is leaning up against my other computer
3 just so I have a way to keep it vertical.

4 Q And is that other computer on?

5 A Yes.

6 Q Okay. What screens do you have open on that
7 computer, ma'am?

8 A Just the screen saver. I haven't logged into it.

9 Q I'm going to ask you to turn the computer off.

10 You can keep the iPhone up against it, but please
11 turn the computer off.

12 A Okay, it's off.

13 Q Thank you.

14 And did you meet with your lawyer to prepare for
15 today's deposition?

16 A We had a phone call.

17 Q When was that phone call?

18 MR. ARGENTO: Note my objection, but you can
19 answer.

20 A This morning.

21 BY MS. NAPPI:

22 Q And without telling me what you spoke about with
23 your lawyer, was anyone else present?

24 A No.

25 Q And other than your counsel, did you speak to

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1 anyone else about today's deposition?

2 A No.

3 Q Okay. To prepare for today's deposition, did you
4 read any documents?

5 A No.

6 Q Were any documents read to you?

7 A No.

8 Q Does anybody know that you are testifying here
9 today besides your lawyer?

10 A No. Well, the camp -- the folks from the camp
11 board who asked me if I would be willing to give a
12 deposition, but they don't know that this specific date was
13 finally agreed on.

14 Q Okay. And at any point prior to today's
15 deposition, were you asked by anybody to look for documents
16 that might be relevant to this case?

17 A When I was contacted initially by the group that
18 Smithtown Gospel Tabernacle used to initially investigate
19 the matter, I was asked to look for either an application or
20 some evidence for Rachel and her mother and also Ron Braaten
21 being on the property or on staff that summer.

22 Q Okay. At that time were you employed by Camp
23 Cherith?

24 A No, not at the time.

25 Smithtown Gospel, the group that they employed,

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1 asked for the documents.

2 No.

3 Q Just to clarify my question because it was a poor
4 question, at that time were you employed by Camp Cedarbrook?

5 A No.

6 Q Okay. And did you have any documents that were
7 responsive to that request?

8 A A staff list from that summer.

9 Q And who did you provide that staff list to?

10 A The folks that were employed by Smithtown Gospel
11 Tabernacle.

12 Q And by "the folks employed by Smithtown
13 Tabernacle Gospel --

14 A Yeah.

15 Q -- I think I just reversed it.

16 A That's okay.

17 Q Do you mean Grace, ma'am?

18 A Yes.

19 Q Have you ever testified in court before?

20 A No.

21 Q And have you ever been a plaintiff or a defendant
22 in a lawsuit?

23 A No.

24 Q Have you ever posted about this case on social
25 media?

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1 A No.

2 Q Have you ever talked about this case with any
3 person outside of your attorney or the folks at Grace?

4 A Initially when I received the notification, I
5 spoke with Lea Mane, who was the counselor. She was the
6 first one to contact me.

7 And then I called the chair of the board of Camp
8 Cedarbrook to let them know that I had been contacted about
9 the matter.

10 Q Okay. And who is Lea Mane?

11 A Lea Mane was the counselor -- was Rachel's
12 counselor for the week.

13 Q And what did you talk about with Ms. Mane?

14 A She sent me a message, and then I talked with her
15 on the phone about the fact that Rachel had contacted her
16 and disclosed to her that she had been abused.

17 Q When did Rachel --

18 Strike that.

19 To your understanding, when did Rachel disclose
20 to Ms. Mane that she had been abused?

21 A I don't remember the exact date. I don't
22 remember.

23 Q Is it your understanding that Rachel disclosed
24 the abuse when she was an adult or a child?

25 A When she was an adult.

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1 Q And do you remember anything specific that
2 Ms. Mane told you about the conversation she had with
3 Ms. Volkel?

4 A Only that Ms. Volkel asked her if she had noticed
5 anything different about her behavior during that week when
6 she was at camp. That's the only specific that I can
7 recall.

8 Q And how did Ms. Mane message you in the first
9 place?

10 A Messenger.

11 Q Facebook Messenger?

12 A Yeah.

13 Q Do you still have that message, ma'am?

14 A I don't know. I would have to look.

15 MS. NAPPI: To the extent that it exists, we're
16 going to make a demand for a copy of that message.

17 THE WITNESS: Okay.

18 MR. ARGENTO: Noted. I'd just ask that any
19 demands be followed up in writing.

20 MS. NAPPI: No problem.

21 BY MS. NAPPI:

22 Q And I think you testified that you also spoke
23 with the chair of the board about Ms. Volkel's allegations;
24 correct?

25 A Correct.

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1 Q And who was the chair of the board?

2 A Danielle Hedgepath.

3 Q What did you discuss with Ms. Hedgepath?

4 A Just the fact that Lea had contacted me, and I
5 shared the allegation with her.

6 Q Okay. And what did Ms. Hedgepath say in
7 response?

8 A Her response was shock and surprise.

9 Q And what was your reaction to learning of Ms.
10 Volkel's allegation?

11 A Shock and surprise and dismay.

12 Q And did you know Mr. Braaten personally?

13 A Yes.

14 Q Let's just back up a little bit.
15 Where were you born, ma'am?

16 A In Long Island College Hospital, Brooklyn.

17 Q And did you grow up in Brooklyn, ma'am?

18 A No.

19 Q Where did you grow up?

20 A Hicksville, Long Island.

21 Q Did you attend high school?

22 A Yes.

23 Q Where did you attend?

24 A Hicksville High School.

25 Q What year did you graduate?

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1 A 1969.

2 Q Did you attend college after you graduated high
3 school?

4 A I did.

5 Q What college did you attend?

6 A Philadelphia College of Bible.

7 Q And what year did you graduate?

8 A 1973.

9 Q And what was your degree in?

10 A It was a Bachelor of Science in Bible and
11 Christian Education.

12 Q And after you received your bachelor's, did you
13 continue on with your education, or did you immediately
14 start to work?

15 A I worked for a year.

16 Q Where was that?

17 A Ross Corners Christian Academy in Endicott, New
18 York.

19 Q And what was your position there?

20 A I was a physical education teacher.

21 Q And how long were a PE teacher there?

22 A year?

23 A Just one year.

24 Q What was your next place of employment?

25 A I went to Arizona State for my master's degree,

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1 and I worked as a volleyball official and substitute teacher
2 while I was going to graduate school.

3 Q And what was your duties as a volleyball official
4 while you were in graduate school?

5 A You officiate volleyball games.

6 Q And were you responsible for supervising children
7 at that point or just overseeing the games?

8 A Overseeing the games.

9 Q And how long did you have that position?

10 A Two years off and on.

11 It's not a regular position.

12 Q Is it seasonal?

13 A Yes.

14 Q Okay. And were you in school the full two years
15 while you were seasonally officiating volleyball games?

16 A I was in school a year and a half.

17 Q What year did you get your master's degree from
18 Arizona State?

19 A 1975.

20 Q At the time you were in schooling earning your
21 master's degree, other than the volleyball officiating, did
22 you have any other methods of employment?

23 A I did one season as basketball coach for
24 elementary kids from a Catholic school.

25 Q Were you a full-time employee in that position,

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1 or was it a part-time position?

2 A No, it was a part time position.

3 Q And after you graduated in 1975 with your
4 master's degree, what was your next place of employment?

5 A I did substitute teaching for a couple of
6 different school districts in the Phoenix area.

7 Q Okay. And did you have your teaching license at
8 this point?

9 A No.

10 Q And what year did you get your teaching license?

11 A I did not get my teaching license.

12 Q Okay. So how long did you work in Phoenix as a
13 substitute teacher?

14 A During the spring of 1976, as far as I can
15 recall.

16 Q How many schools did you work at approximately in
17 that time frame?

18 A You know, I don't recall.

19 Q What grades were you primarily substituting for?

20 A Both elementary and secondary.

21 Q Okay. After you substituted teaching in 1976,
22 what was your next employment?

23 A As a physical education instructor at the Kings
24 College. That was in Briarcliff Manor, New York.

25 Q What year was that?

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1 A I started there in the fall of 1976.

2 Q And how long were you employed there?

3 A Until the end of the spring semester in 1993.

4 Q Okay. And after you left Kings College in 1993,
5 what was your next place of employment?

6 A Hofstra University on Long Island.

7 Q Okay. And so that was in 1993?

8 A Mm-hmm.

9 Q I'm sorry. I couldn't hear you.

10 A The fall of '93 is when I started there.

11 Q Okay, thank you.

12 How long were you employed by Hofstra?

13 A I retired after the spring semester in 2018.

14 Q At what point were you associated with Camp
15 Cherith?

16 A I went there as a camper when it opened in the
17 summer of 1966.

18 Q Okay. And did there become a time when you were
19 employed by Camp Cherith?

20 A Yes.

21 Q What year was that?

22 A I believe it was 1970.

23 Q Okay. And can you describe your first title, I
24 guess, with Camp Cherith as an employee in 1970?

25 A I was a counselor.

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1 Q Okay. How old were you then?

2 A Eighteen.

3 Q And did you just work for Camp Cherith in the
4 summers?

5 A Yes.

6 Q Okay. And so in 1970 you were a counselor.
7 At what point do you advance to your next role?

8 A I don't remember the year.

9 Q Okay. Can you approximate maybe how old you
10 were?

11 A Maybe 20.

12 Q And what was that next role, ma'am?

13 A The next role was division director.

14 Q Okay. And how long were you division director?

15 A I think just one summer.

16 Q Okay. And what was your next role?

17 A Activity specialist.

18 Q And how many summers were you an activity
19 specialist?

20 A I don't recall exactly.

21 Q Could you approximate for me?

22 A At least two or three.

23 Q And your next role, ma'am?

24 A Was as the program coordinator.

25 Q How long were you program coordinator?

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1 A Approximately three years.

2 Q Okay. And your next role?

3 A Assistant director.

4 Q How long were you assistant director, ma'am?

5 A One year.

6 Q And then did you finally become the executive
7 director?

8 A Yes.

9 Q Okay. And how long were you the executive
10 director?

11 A Summer of '79 to the end of summer of '15.

12 Q So quite a long time?

13 A Yes.

14 Q You've had many roles at Camp Cherith.

15 How many of the roles you just described involved
16 direct supervision of campers?

17 A Counselor, activity specialist, and the division
18 director.

19 Q Okay. Can you just tell me sort of the hierarchy
20 of positions at Camp Cherith, assuming that the executive
21 director is sort of like the head of the entire camp?

22 A At the time I was directing, we had a director
23 and then four assistant directors, one for counseling, one
24 for program, one for support services, and then each of
25 those people supervised either division directors for

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1 support services, folks who worked in the different support
2 areas like the kitchen and the maintenance people. The
3 program assistant director did the program scheduling and
4 curriculum development.

5 Who did I leave out?

6 The assistant director for counseling supervised
7 the division directors. Division directors supervised the
8 counselors in each of the four divisions, and then those
9 counselors supervised the campers indoor cabin groups.

10 Q Okay. So is it fair to say that campers would
11 have had the most direct supervision from their counselors?

12 A Well, either their counselors or their activity
13 leaders when they were in activities.

14 Q Can you just briefly describe the job duties of a
15 counselor at Camp Cherith?

16 A The counselor is responsible to supervise the
17 campers. Counselors also led a Bible study every day and
18 cabin devotions. Counselors would teach different
19 activities, not necessarily the ones that their campers had
20 signed up for. Campers signed up for activities
21 independently of their cabin group. They supervised campers
22 at meal times. They supervised campers during times when
23 campers were getting up or getting ready for bed. They
24 supervised the campers at night.

25 Yeah, basically the only time they didn't

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1 supervise campers and do activities with them would be when
2 the campers were at activities.

3 Q And how old were counselors typically?

4 A At least 18.

5 Q So it's fair to say that all of the counselors
6 were adults and not older children, you know, that attended
7 the camp?

8 A Correct.

9 Q Okay, thank you.

10 And what would be then the job description, to
11 your understanding, of the activity directors that you just
12 described?

13 A Are you talking about the people that taught
14 activities or the activity directors?

15 Q Okay. So let's break that up.

16 Let's talk about the activity -- the people who
17 taught the activities first, please.

18 What was their job description, to your
19 understanding?

20 A Their job description was, again, to supervise
21 the campers -- everybody's job description includes keeping
22 the campers safe and healthy -- and then to teach the
23 activity, whatever that activity happened to be.

24 Q What was the job description, to your
25 understanding, of the activity specialist.

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1 A The activity specialist was responsible for
2 supervising the activity leaders, including making sure that
3 the area was meeting all the safety standards, making sure
4 that the activity leaders were teaching according to the
5 curriculum, that they had everything they needed, give them
6 training, and to let the program coordinator know if there
7 was need for supply or some kind of repairs in the area.

8 Q Who would have been responsible for hiring
9 counselors?

10 A In 1996 that would have been me.

11 Q And is it your understanding that Ms. Volkel
12 attended Camp Cherith in 1996?

13 A That's my understanding.

14 Q When you hired camp counselors in 1996, did they
15 have to submit an application?

16 A Yes.

17 Q And were they subject to a background check?

18 A I don't recall when background checks were
19 implemented.

20 We implemented background checks as soon as they
21 were available to us to do that.

22 Q And did Camp Cherith maintain employee personnel
23 files?

24 A Yes.

25 Q And you testified earlier that you know Ron

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1 Braaten; is that correct?

2 A That's correct.

3 Q Was Ron Braaten an employee of Camp Cherith at
4 any point?

5 A No.

6 Q Was Linda Braaten an employee of Camp Cherith?

7 A Yes.

8 Q And do you know if there was an employee file
9 maintained on Linda Braaten?

10 A There was at the time. It does not exist now.

11 Q Okay. How do you know that it does not exist
12 now?

13 A Because I looked for the files when I first
14 became aware of the situation.

15 Q Okay. What is Camp Cherith's typical retention
16 for employee files in terms of years?

17 A About seven.

18 Q And if there had been a background check done on
19 Mrs. Braaten, would that have been in her employee file?

20 A Yes.

21 Q And we just talked about several positions that
22 are at Camp Cherith.

23 Are there also volunteer positions for adults at
24 the camp?

25 A Yes.

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1 Q What are the volunteer positions, ma'am?

2 A Most commonly maintenance or nurse or assistant
3 nurse or assistant maintenance, and then the kitchen
4 sometimes and activity areas.

5 Q And would volunteers have also been subjected to
6 a background check in 1996?

7 A If that was available.

8 Q And does Camp Cherith also maintain files on the
9 volunteers that work at the camp?

10 A Yes.

11 Q And do you know if a volunteer file was kept with
12 respect to Cathy Volkel?

13 A It was at the time, but as I mentioned before,
14 the records from 1996 don't exist at this time.

15 Q And so you --

16 Strike that.

17 Did you search for Cathy Volkel's volunteer file?

18 A Yes.

19 Q And did you find Cathy Volkel's volunteer file?

20 A No.

21 Q Bear with me a minute.

22 Were counselors who were hired in 1996 permitted
23 to live on the premises of the camp?

24 A Yes. It's a resident camp.

25 Q And do all the employees reside on the premises

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1 of the camp for the duration of their employment?

2 A Yes, with some exceptions.

3 Q What are the exceptions, ma'am?

4 A We have had one or two employees who lived in the
5 town nearby, so they stayed at home and came in.

6 We have had one or two volunteers that lived
7 nearby and so stayed at home and then came in to work during
8 the day.

9 Q Okay. And so if an employee is married, is the
10 benefit of the residence provided to the employee for the
11 duration of their employment extended to their spouse?

12 A Not if the spouse is not a volunteer or staff
13 member.

14 Q Okay. And so if a married employee was working
15 for a summer and --

16 Strike that.

17 If a married employee was working at Camp Cherith
18 for the summer, are they allowed to have visitors?

19 A Yes.

20 Q And what's the policy for a visitor arriving at
21 the camp in terms of being screened?

22 A We need to know ahead of time that the person is
23 coming, and the person needs to report to the office when
24 they arrive at the property, and the person is apprised of
25 areas of the camp to which they may not go, living areas

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1 typically, camper living areas. The person is not permitted
2 to just roam the property freely.

3 Q And was that the policy in 1996?

4 A Yes.

5 Q Were visitor logs kept?

6 A No.

7 Q Were visits of any person coming to the camp
8 memorialized in any way?

9 A No.

10 Q And are you aware if Ron Braaten visited the camp
11 in 1996?

12 A No, I'm not.

13 Q And would you have any way of going back and
14 verifying whether he attended the camp at any point as a
15 visitor or an employee in 1996?

16 A No, I would not.

17 Q Do you recall when this lawsuit was filed, ma'am?

18 A I don't know the date that the lawsuit was filed,
19 no.

20 Q Have you ever seen any of the documents in this
21 lawsuit at all?

22 A No.

23 The only thing I've seen is the report done by
24 Grace.

25 Q And how did you receive that report, ma'am?

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1 A They sent me a transcript after I was
2 interviewed.

3 Q Okay. And did you review that transcript in
4 preparation for today's testimony?

5 A No.

6 Q And at any point did you discuss the defenses
7 that Camp Cherith was going to put forth in this case with
8 the people at Camp Cherith, but not the attorney
9 representing you here today?

10 MR. ARGENTO: Just note my objection, but over my
11 objection you can answer.

12 A No.

13 BY MS. NAPPI:

14 Q Okay. You testified that you searched for
15 documents in this case.

16 Can you describe how you searched for documents
17 at various points in this litigation, please?

18 A I asked the board chairman to go to the camp and
19 look for the records.

20 Q Did you physically go to the camp and look for
21 the records?

22 A No, I did not.

23 Q And were the records digitized or in file
24 cabinets?

25 A The only records that we found were the health

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1 records, and they were -- they're stored in file boxes.

2 I also asked the person who had the staff lists
3 for a copy of the staff list. That's all that we found.

4 Q Okay. What health records did you locate?

5 A Every camper and staff member fills out a health
6 history form, and then the nurse documents any visits to the
7 health center, and those are attached, and then we store
8 them until campers are -- past the limit of time when we'd
9 need to store them.

10 Q Okay. And did you locate health records for
11 Rachel Volkel?

12 A I believe we did.

13 Q And do you know where those records would be
14 stored?

15 A I do not.

16 MS. NAPPI: To the extent that those documents
17 haven't been produced, we're going to make a demand for
18 them.

19 MR. ARGENTO: Taken under advisement.

20 BY MS. NAPPI:

21 Q Did you locate health records for Linda Braaten?

22 A No.

23 Q Did you locate health records for Cathy Volkel?

24 A No.

25 Q Did you locate health records for any other

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1 employee or volunteer from 1996?

2 A No.

3 Q Do you know why it would be that a camper from
4 1996 records would be retained, but the staff members'
5 records would not be?

6 A Oh, I'm sorry. They were all retained.

7 We didn't look for --

8 As far as I know, we didn't look for any of the
9 other ones that you mentioned.

10 Q So I just want to make sure I'm understanding.

11 Are you saying that you looked for Ms. Rachel
12 Volkel's records, but not Mrs. Braaten or Mrs. Volkel's
13 records?

14 A I can't be sure of that.

15 Q I'm just trying to understand what you meant by
16 you located one person's, but not the other people.

17 So what did you mean?

18 A I probably misspoke.

19 I don't know how many we located.

20 Q Okay. Do you know how many you searched for?

21 A I do not.

22 Q But you believe that you located Rachel Volkel's
23 records?

24 A I think so, but I can't be sure.

25 Q Did you read Rachel Volkel's records?

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1 A No.

2 Q Do you have an understanding of what was
3 contained in those records?

4 A No.

5 Q Did you discuss those records with any other
6 employee of Camp Cherith?

7 A No.

8 Q Did you give those records to Grace?

9 A I did not. I did not.

10 I never had those records in my possession.

11 Q So are you sure that they exist, ma'am?

12 A No, I'm not.

13 Q Did you ever meet Ms. Volkel?

14 A Not to my recollection.

15 Q And did you ever have a conversation with Ms.
16 Volkel at any point?

17 A Not to my recollection.

18 Q Of the positions that existed at Camp Cherith
19 that had direct involvement with children, was there a
20 training manual or guide set up for those positions with
21 respect to those job duties?

22 A Yes.

23 Q Who created that document?

24 A Mostly I put it together.

25 Q And was there a written policy in 1996?

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1 A A written policy about what?

2 Q Well, general guidelines for staff
3 specifically --

4 A Yes.

5 Q Let me just finish the question. I'm sorry.
6 -- specifically the positions that had direct
7 supervision of children.

8 A Yes.

9 Q Who created that document?
10 MR. ARGENTO: If you recall.

11 A I don't recall.

12 BY MS. NAPPI:

13 Q Do you know the title of the document?

14 A All of them are entitled "Job Description for"
15 whatever the position is.

16 Q Okay. And as the executive director in 1996, you
17 were responsible for the hiring of positions at the camp?

18 A Yes.

19 Q And did you generally create job descriptions for
20 positions at the camp?

21 A I don't recall whether I created them or we used
22 them from templates provided by either the Pioneer Clubs
23 organization, of which we were affiliated, or American Camp
24 Association.

25 Q And were they saved, to your knowledge, in any

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1 way by the camp?

2 A I can't say that the exact ones from 1996 were
3 saved. Some of the job descriptions have been modified over
4 the years.

5 But yes, there are job descriptions for every
6 position at camp.

7 MS. NAPPI: We're going to make a demand again
8 for those job descriptions for 1996 to the extent that
9 they exist and haven't been produced.

10 MR. ARGENTO: Solely asking for the ones in '96?

11 MS. NAPPI: Yes.

12 MR. ARGENTO: Okay. Taken under advisement.

13 BY MS. NAPPI:

14 Q To your recollection, did any of the camp
15 counselor positions require specialized training for
16 overseeing children?

17 A Yes, all of the counselors participated in
18 specialized training for overseeing children.

19 Q What was that training in 1996?

20 A The training included guidelines for how to work
21 in a positive way with children. They included behavior
22 management guidelines, how to help children manage their
23 behavior. It included safety. It included how to greet
24 campers, how to work with your group so that the group would
25 come together. The training included how to teach their

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1 Bible studies and devotional times. It included guidelines
2 and specific training for child abuse prevention.

3 Q Where did the training take place?

4 A The training took place on site at camp, and the
5 staff manual that included a lot of the information for the
6 training was sent to each staff member, whether they were
7 employed by camp or volunteers, prior to coming to camp.

8 Q Okay. And the training that took place at the
9 camp, how long was that?

10 A In 1996 I believe it was a two-week training.

11 Q Were there live instructors providing this
12 training?

13 A Yes.

14 Q Do you recall who those live instructors were?

15 A I don't know that I recall all of them.

16 I did a fair amount of the training.

17 Q And do you hold any specialized certificates or
18 degrees to allow you to train counselors?

19 A I am a certified camp director, and part of that
20 training included training staff.

21 Q Where did you get your certification in being a
22 camp director from?

23 A From the American Camp Association.

24 I also regularly participated in conferences. I
25 went to sessions dealing with how to work with campers in a

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1 positive way.

2 Q What year did you get that certification?

3 A I can't be sure.

4 It was early on before 1996.

5 Q Okay. And did you take any specialized courses
6 in recognizing the signs of childhood sexual abuse?

7 A Yes.

8 Q When did you take that?

9 A I can't be sure of the date.

10 Early on.

11 Q Was it in the '70s?

12 A I participated in staff training as a counselor.

13 So, yeah, I would say it was in the '70s.

14 Q And what do you recall learning in the '70s about
15 childhood sexual abuse?

16 A How to look for what the signs and symptoms were
17 of childhood sexual abuse. We learned the report -- the
18 reporting procedures. We learned prevention in terms of
19 working with campers.

20 Q And what are the signs and symptoms of childhood
21 sexual abuse, to your understanding?

22 A To my understanding --

23 MR. ARGENTO: Objection. You can answer.

24 A There are any number of them.

25 There are physical signs such as unusual bruises,

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1 burn marks, et cetera. There are some emotional signs,
2 sometimes bedwetting, withdrawn behavior.

3 I don't know that I can recall all of them
4 specifically.

5 BY MS. NAPPI:

6 Q And so did you take any refresher courses on the
7 signs and symptoms of childhood sexual abuse from 1970 on?

8 A I didn't take any refresher courses, but I
9 regularly reviewed the materials, both the materials that we
10 had in the staff manual and the materials that we used with
11 the staff.

12 Those included early on a book by Becca Cowan
13 Johnson "For Their Sake" on recognition and prevention of
14 child abuse, also films provided by the American Camp
15 Association, "Envelope of Safety," that was done by Dr. Bob
16 Ditter, a child psychologist, and then --

17 Yeah, that would have been the one we used at the
18 time.

19 Q Okay. And how did your training that you just
20 testified about translate to the training that you provided
21 to counselors in 1996?

22 A We used all those I mentioned, and we also used
23 the New York State -- New York State provides materials and
24 also guidelines for instruction in child abuse prevention.

25 Q And did counselors have to sign off or

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1 acknowledge in any way that they received this training?

2 A Yes.

3 Actually, we used an affidavit form that contains
4 all of the guidelines. That was also created by Dr. Bob
5 Ditter that you had to signed that they had read it and
6 agreed to abide by those guidelines.

7 Q And when campers arrived in 1996, did they have
8 to participate in any type of orientation?

9 A Yes.

10 Q Can you describe what that orientation was like?

11 A They had a tour of the property so that they
12 would become familiar with the property, and also the safety
13 guidelines and boundaries of the property.

14 They would have a swim test to determine their
15 swim ability and let them know which areas, you know, of the
16 swimming area they could swim in based on their ability.

17 They did a canoe check where they were instructed
18 in how to get in and out of the canoe safely, how to put on
19 a life jacket, what to do if they capsized, and all the
20 safety rules regarding that. We also went over safety rules
21 at the waterfront.

22 They would choose their activities and get a
23 little explanation, both on tour and in the activity choice
24 time, of what the activity involved.

25 They also had orientation to the rules or

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1 guidelines for their age group division, including safety
2 rules.

3 Then we would also go over the camper -- rules
4 for campers.

5 Q Can you describe --

6 A Pardon me?

7 Q No, I think I meant --

8 I think cut you off, and I didn't mean to.

9 Were you finished?

10 A Yeah.

11 Q Thank you. I'm sorry.

12 What were the rules for campers in 1996?

13 MR. ARGENTO: Just note my objection. It's a
14 very wide question.

15 What specific rules are you asking about?

16 MS. NAPPI: She just testified that the campers
17 went over the rules. So I can clarify my question.

18 BY MS. NAPPI:

19 Q To your understanding, what rules did the campers
20 go over in their orientation?

21 A I'm not sure I can quote all of them to you, but
22 things like -- things that had to do with safety around the
23 property, everything from as simple as wearing closed-toed
24 shoes, unless they are going to the beach.

25 The property is in the forest, and it's possible

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1 to trip over roots and rocks. If they had open-toed shoes,
2 we didn't want them to hurt themselves.

3 Rules for how they needed to behave with each
4 other, treating each other with kindness and respect,
5 letting them know that if somebody treated them otherwise,
6 they should let a counselor or staff member know.

7 On their orientation tour, they went by the Bird
8 House. They were instructed and they got to know about the
9 other staff living areas, where they were on the tour. We
10 told campers they're not to go to staff living areas.

11 Those are the ones that I can remember
12 specifically offhand.

13 Q Okay. And Camp Cherith is a Christian camp;
14 correct?

15 A Correct.

16 Q And how did the Bible study portion of this, in
17 your opinion, intersect with these rules and regulations for
18 the staff and children?

19 A The Bible studies were not specifically designed
20 to intersect with the rules but, for example, our Community
21 Living Principles, things like treating each other with
22 kindness, loving each other, accepting each other,
23 encouraging each other, those are all Biblical principles.

24 Q In 1996 was there a document that contained the
25 Community Living Principles that governed Camp Cherith?

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1 A I'm not sure.

2 I think so, but I'm not sure.

3 Q Okay. And if that document existed, who would
4 have written it?

5 A I did, based on specific versus from the Bible.
6 We were told how to treat each other and how to live with
7 each other.

8 Q Do you remember what versus you would have used
9 to guide you to write the Community Living Principles for
10 the camp?

11 A Off the top of my head, no.

12 Q Would the Community Living Principles have been
13 reviewed by any other person or entity?

14 A The camp board would have seen them.
15 Anyone who had access to the staff manual would
16 have seen them.

17 Q Do you remember what the structure of the board
18 was in 1996?

19 A There was a board president. There is a board
20 vice president. There's a secretary and then a treasurer.

21 Q Okay. Were there any sub-boards?

22 A No.

23 Q And do you recall who the chairman of the board
24 was in 1996?

25 A I do not.

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1 Q When Ms. Volkel attended the camp in 1996, do you
2 know if there was a standard list of activities that she
3 would have participated in?

4 A One that exists now, no.

5 Q Okay. Do you recall what it was in 1996?

6 A Specifically, no.

7 Q Could you generally describe the typical
8 activities that a camper would have participated in, in
9 1996?

10 A Sure.

11 Could have been instructional swimming, could
12 have been canoeing for Rachel's age group.

13 Not sailing.

14 Crafts, nature, hiking, outdoor living skills.

15 Sometimes there were drama activities or puppet
16 activities.

17 That's all that I can recall.

18 Q And would Rachel's age group typically have
19 participated in swimming, assuming that the individual
20 campers passed the swimming test?

21 A Yes.

22 Q Was there an official policy for observing
23 children while they were participating in their swimming
24 activities?

25 A Absolutely.

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1 Q Can you describe it?

2 A Yeah. New York State Health Department has
3 pretty strict requirements in terms of lifeguards being
4 present at all swimming activities, and also a water safety
5 instructor, as well as waterfront lifeguard certification
6 for folks that are supervising swimming areas.

7 Q Okay. And so the swimming at Camp Cherith was in
8 a lake; correct?

9 A Yes.

10 Q And where were the bathrooms that children would
11 have used in relation to the lake?

12 A We had an outhouse that was adjacent to the area
13 where the beach was.

14 Q And if a child was leaving the swimming area
15 going to the bathroom, for instance, was there a policy of
16 where the counselors should have been in 1996 with respect
17 to the campers?

18 A No, not to my knowledge.

19 Q If a camper left the lake at any point in 1996,
20 did their departure have to be noted in any way?

21 A Yes. We used the buddy board check in and out
22 system, so the camper would have had to let the buddy board
23 person know and change the tag from the in-the-water to
24 out-of-the-water status.

25 Q Did the buddy board let anyone else know that the

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1 camper was leaving the area or just that the camper was not
2 in the water at the time?

3 A Just that the camper was not in the beach area at
4 the time.

5 Q So if children wanted to leave the beach area and
6 go to another area in the camp, were they free to do so
7 without a counselor, or did they need a counselor to be with
8 them?

9 A They could do that without a counselor at that
10 time.

11 Q Did there come a time where that policy changed?

12 A Yes.

13 Q Do you recall what year that was?

14 A Not specifically.

15 It was in the 2000s. New York State Department
16 of Health changed their rules for camp supervision so that
17 there was no time when the counselor or camper was out of
18 sight or hearing of the staff member.

19 Q Understood.

20 Can you generally describe what the premises at
21 Camp Cherith was like?

22 A We have about 500 acres of Adirondack forest
23 property with a lake, approximately 45-acre lake.

24 Can you be more specific?

25 Q That's a little helpful. We can drill down from

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1 it.

2 So on the 500 acres, how many housing facilities
3 in 1996 were the campers not allowed to go into?

4 A Approximately six.

5 Q And how many building structures in 1996 existed
6 on the 500 acres in total, if you recall?

7 A 6 platform --

8 12 platform tents where the older girls lived,
9 approximately 12 cabins where the younger girls lived, 3
10 bathhouses, a dining hall structure, health center, a staff
11 residence office, an extra cabin used for storage,
12 directors' cabin, nature center, stables, Bird House, three
13 staff living trailers, and a small staff cabin and a
14 maintenance barn.

15 Q Okay, thank you.

16 So other than the 6 buildings you identified,
17 generally campers could use all of the facilities on the
18 premises of the camp freely?

19 A No.

20 Q Can you explain the restrictions to me, please?

21 A Well, they couldn't --

22 They're not permitted to use activity areas
23 unless they were in that particular activity.

24 The only --

25 They would have been either with their cabin

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1 group or with an activity, with the exception of 45 minutes
2 to an hour in the afternoon of what was then called free
3 time, where they could go to the camp store, they could go
4 to the beach and swim, they could go to the canoe beach and
5 take out a canoe.

6 Again, you know, those areas were supervised by
7 staff members.

8 Q Okay. And do you recall how many campers were
9 present in 1996?

10 A I do not.

11 Q And did the campers typically attend for one week
12 or longer periods?

13 A Most of our campers attended for one week. Some
14 of them would stay longer.

15 Q Did you know Ron Braaten?

16 A Yes.

17 Q When did you first meet Mr. Braaten?

18 A I don't recall an exact date or time when I first
19 met him.

20 He enrolled his children in camp, so I suppose I
21 would have met them when they brought their kids to camp.

22 Q Okay. Did you ever socialize with Mr. Braaten?

23 A No.

24 Q And other than learning about the allegations in
25 this lawsuit, did you ever hear any other rumors or musings

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1 about Mr. Braaten's involvement with young girls?

2 A No.

3 Q What's your knowledge of the underlying incidence
4 of Ms. Volkel's lawsuit?

5 A I only know what I read in the Grace report.

6 Do you want me to --

7 Q Yeah, please.

8 Yeah, just describe your knowledge, if you can.

9 A Supposedly she said that her friend Sandra had
10 asked her to come and play in the Bird House. That's what
11 we call that particular staff living structure.

12 And there were not details given of the abuse.
13 Just said that Mr. Braaten abused her, and that she also
14 said that he abused Sandra on the same occasion.

15 I don't have a lot of details.

16 Q Okay, thank you.

17 So is it your understanding that Sandra is Linda
18 and Ron Braaten's daughter?

19 A Yes.

20 Q Okay. And Linda Braaten was an employee at the
21 camp in 1996 when Rachel attended; correct?

22 A Yes.

23 Q Okay. Did Linda Braaten and Sandra Braaten sleep
24 in the same building?

25 A Yes.

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1 I don't recall whether Sandra was in a cabin
2 group at any time during that summer.

3 Sometimes staff children would be in a cabin
4 group for a week or, you know, more than a week at different
5 times during the summer, but I don't recall.

6 She would have been staying in the Bird House
7 with Linda.

8 Q Cathy Volkel volunteered the week that Rachel
9 attended Camp Cherith; correct?

10 A As far as I know, yes.

11 Q Did Cathy Volkel sleep in the same building as
12 Rachel Volkel, to your knowledge?

13 A I don't know specifically that she did. I have
14 no knowledge.

15 Q I'm sorry. I thought you were saying you have no
16 knowledge.

17 Is that correct?

18 A I don't remember.

19 Q I'm sorry. I cut you off, and I just wanted to
20 make sure that your answer was there. I apologize for that.

21 A No worries.

22 Q So hard on Zoom. I'm so sorry.

23 A I know. I teach on Zoom. I get it.

24 Q You're already better at it than me.

25 So at some point Camp Cherith legally changed its

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1 name; correct?

2 A Yes.

3 Q Do you know what year that was?

4 A I want to say it was around 2008.

5 Q Do you have an understanding of the reasoning
6 behind the name change?

7 A Yes.

8 Q Can you describe what you understand the reason
9 for the name change to be, please?

10 A Prior to that time, we were a part of the Pioneer
11 Girl Club Association.

12 At that time there was indication that Pioneer
13 Girl Clubs no longer wanted to support the camps that were
14 affiliated with it, and so the camps came together and
15 created their own association and decided to change the name
16 to Cedarbrook because the Cherith name is trademarked.

17 Q And in 1996, to your knowledge, did Camp Cherith
18 have any official relationship with SGT?

19 A No.

20 Q Are you aware how many campers from --
21 Strike that.

22 Are you aware of a number or percentage of
23 campers who attended Camp Cherith that also attended SGT?

24 A No.

25 Q Do you know how it was that Linda Braaten became

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1 employed by Camp Cherith?

2 A She volunteered. She submitted an application to
3 come to camp during that summer.

4 Q Was this before or after her children attended
5 Camp Cherith?

6 A After.

7 Q Do you know how many of the Braaten children
8 attended Camp Cherith?

9 A All of them.

10 Well, not their son.

11 Q In 1996 can you give us an age range of campers
12 who attended the camp, please?

13 A 7 or 8 to up to 18.

14 Q Okay. So would there have been campers who were
15 18 years old, as well as counselors who were 18 years old?

16 A There could have been.

17 We didn't have very many 18-year-olds. They
18 usually stopped coming before that.

19 Q Do you know if any of the campers were given any
20 instruction about boundary violations with respect to
21 physical or sexual contact between campers and adults?

22 A Could you repeat that?

23 MS. NAPPI: Sure. Gina, could you just repeat
24 the question back?

25 (Last question was read back.)

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1 A I don't believe that they were.

2 BY MS. NAPPI:

3 Q Do you know roughly what the cost of attending
4 the camp was in 1996?

5 MR. ARGENTO: Objection, but you can answer.

6 A I do not.

7 BY MS. NAPPI:

8 Q Could you estimate how many adults were either
9 employed or volunteering at the camp in 1996?

10 A That would depend on how many campers we had that
11 summer, which I don't know.

12 Average number of staff would have been 40 to 50.

13 Q In 1996 did the camp have video cameras?

14 A Video cameras for what purpose?

15 Q Monitoring the property.

16 A No.

17 Q Did they have video cameras for any purpose in
18 1996?

19 A No.

20 Q In 1996 were there any security guards on the
21 premises of the property?

22 A No.

23 Q How did the camp provide security then to the
24 campers who attended in 1996?

25 A We provided security to the campers by the

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1 supervision that the staff would give.

2 We also usually had whoever was the maintenance
3 person make a circuit of, not the entire property, but
4 especially the access roads at night just to make sure that
5 there were no intruders.

6 Q Do you know how long Linda Braaten was employed
7 by the camp?

8 A Just that one summer, as far as I'm aware.

9 Q And do you know if any of her immediate family
10 members resided with her at the camp?

11 A Just Sandra, as far as I know.

12 Q Are you aware if Mr. Braaten ever visited the
13 camp?

14 A No, I'm not.

15 Q Would you have any way of verifying whether he
16 visited the camp or not?

17 A No, I do not.

18 Q Just bear with me a minute. You answered some of
19 these questions with some of your answers, and I'm trying to
20 be efficient so I don't have to keep you here all day. I'm
21 sorry.

22 A That's all right.

23 Q Thank you so much for your time.

24 In 1996 did you have any direct oversight over
25 campers as part of your day-to-day responsibilities at the

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1 camp?

2 A No.

3 Q If a camper had any kind of issue where they
4 wanted to speak to you as the executive director, what would
5 have been the protocol or policy by which that camper could
6 have gotten to speak to you?

7 A There was not a policy. If a camper wanted to
8 speak to me, they certainly could. They would just need to
9 either ask me or ask their counselor or ask their division
10 director.

11 Q Are you aware of what a mandated reporter is?

12 A Yes.

13 Q Can you describe what your understanding of a
14 mandated reporter is?

15 A A mandated reporter is someone who has
16 responsibility for children and is required to report to
17 local authorities, child protective services, any suspicion
18 of child abuse, any disclosures that children might make.

19 Q And is it your understanding that the mandated
20 reporting requirement applied to camps in 1996?

21 A Yes.

22 Q And in 1996 was there any mechanism by which
23 campers could disclose abuse or neglect to receive help from
24 any camp employee?

25 A Yes.

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1 Part of our training in the child abuse
2 recognition and prevention included instruction to
3 counselors that if a child disclosed anything to them or if
4 they had, you know, suspicion of abuse, that they were to
5 let the division director know, who would let me know right
6 away they were, then I would contact Child Protective
7 Services.

8 Q And were campers advised of this at the
9 orientation that they attended when they arrived in 1996?

10 A Not specifically, no.

11 Q Do you believe they were advised of this in any
12 way?

13 A I don't think so.

14 Q Do you know if campers were instructed about
15 adults having physical contact with them?

16 A No.

17 Staff was instructed as part of the training, but
18 not campers.

19 Q Were campers instructed about adults having
20 sexual contact with them?

21 A No.

22 Q In 1996 were there written Employee Handbooks?

23 A Yes.

24 Q In 1996, were there written Employee Handbooks?

25 A Yes.

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1 Q Okay. And who wrote those handbooks?

2 A The handbooks were a compilation of what had been
3 in the handbooks prior to my tenure as director, documents
4 from American Camp Association.

5 Some of the policies were written by board
6 members and/or written by according to whatever the
7 regulations happened to be.

8 I wrote some of the materials.

9 Q How frequently were the handbooks updated, to
10 your knowledge?

11 A They were reviewed every year, not necessarily
12 updated every year.

13 Q Is it fair to say that they were reviewed every
14 year, and if an update was required, it would have been
15 made?

16 A Yes.

17 Q Okay. And who would have had the responsibility
18 to do that?

19 A I would have.

20 Q Okay. And do you know if the handbooks, as they
21 were updated, were retained anywhere by Camp Cherith?

22 A Could you clarify that?

23 Do you mean did we keep a series of the different
24 editions, if you will?

25 Q Exactly.

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1 A No.

2 Q So to your knowledge, there wouldn't be a way to
3 find a copy of the 1996 handbook?

4 A No.

5 Q In 1996 did the camp have a policy concerning
6 physical contact between campers and counselors?

7 A Yes.

8 Q Was that in writing?

9 A Yes.

10 I believe it was, yes.

11 Q Okay. And would prior iterations of that policy
12 have been maintained by Camp Cherith?

13 A No.

14 Q In 1996, if complaints were made about a staff
15 member or a volunteer, would those complaints have been
16 memorialized in any way?

17 A It depends on the nature of the complaint.

18 We did have incident reports.

19 So not necessarily.

20 Q Can you give me an example of an event that would
21 trigger the documentation of an -- contained in an incident
22 report?

23 A There would have been an incident report filled
24 out, for example, if there was a conflict between two
25 campers.

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1 Q And if anyone made a complaint about the staff
2 for any reason, would that have been memorialized in any
3 way?

4 A I don't know.

5 MS. NAPPI: I just need like five minutes. I
6 might not have anything else. So if we could just take
7 a five-minute break, we are moving along, if that's
8 okay with everyone.

9 (Recess was taken.)

10 BY MS. NAPPI:

11 Q Is it your understanding that one of the purposes
12 of supervising campers was to ensure their safety and
13 protect them against certain dangers?

14 A Yes.

15 Q And is it your understanding that one potential
16 danger included the risk of a camper being sexually abused
17 at the camp?

18 MR. ARGENTO: Just note my objection, but you can
19 answer.

20 A Yes.

21 BY MS. NAPPI:

22 Q And what was the Bird House typically used for?

23 A Staff housing.

24 Q And would it be unusual that a child would have
25 been in the Bird House?

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1 A Yes.

2 Q Did Ms. Braaten reside in the Bird House?

3 A Yes.

4 Q And you're unsure if Sandra slept and resided in
5 the Bird House as well?

6 A I'm sure that Sandra was in the Bird House --
7 resided in the Bird House from time to time during that
8 summer whenever she was not in -- officially in a cabin
9 group.

10 Q To your understanding, Sandra also participated
11 in activities with campers; right?

12 A Yes.

13 Q And are you aware if any of her friends ever
14 played in the Bird House with her?

15 A No.

16 Q Would anyone have been monitoring that?

17 A No.

18 MS. NAPPI: I don't have anything further. Thank
19 you so much.

20 MR. LESSER: I just have a couple of quick
21 questions for you.

22 My name is Len Lesser, and I represent SGT.

23 EXAMINATION

24 BY MR. LESSER:

25 Q I saw in at least one of the documents that was

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1 submitted to Grace, Danielle Braaten was also listed as an
2 employee or in the staff documentation.

3 Did you see that?

4 A Yes.

5 Q What was her role?

6 A In 1996 I'm not sure.

7 She could have been a division director.

8 Q Was she also living in the Bird House?

9 A No.

10 Q And you had mentioned that all of the Braaten
11 children went to the camp except for the son.

12 Was there a reason the son didn't go to the camp?

13 A It's an all-girls camp.

14 Q Got it. That's a good reason for it.

15 A Yes.

16 Q And after 1996 did the Braatens return to either
17 work or send their kids to the camp?

18 A I'm not sure what year the kids would have aged
19 out at camp.

20 Q Is it your understanding that they continued to
21 go to the camp until they aged out?

22 A As far as I know, yes.

23 Q And just to be clear, are you aware when Ron
24 Braaten would visit the camp from time to time?

25 A Could you clarify that?

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1 Q Were you ever aware that he visited the camp from
2 time to time?

3 A Yes, but the times that I recall are the work
4 weekends that were off-season when there were not campers
5 present.

6 Q And why was he coming to the camp while there
7 were no campers present?

8 A To help us with the construction projects.

9 Q Did he also do assistance in construction
10 projects at other times?

11 A Not that I'm aware.

12 MR. LESSER: Thank you.

13 MR. ARGENTO: I just have a few.

14 EXAMINATION

15 BY MR. ARGENTO:

16 Q Ms. Halliday, prior to the time of the alleged
17 incident, to your knowledge had Rachel Volkel ever mentioned
18 to any Camp Cherith staff like any allegations about Mr. Ron
19 Braaten?

20 A No.

21 Q Did she ever say anything to camp staff after the
22 alleged incident, to your knowledge?

23 A Not until she reached out to her counselor.

24 Q So at no point during the week she was there?

25 A No.

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1 Q Okay.

2 A No.

3 Q Prior to the incident, did Cathy Volkel ever
4 mention anything about Ron Braaten to the staff?

5 A No.

6 Q And at any point after the alleged incident
7 during that week in '96, did she say anything to the staff?

8 A No.

9 Q Did any of your employees, during that one-week
10 period, make any mention of the alleged incident with Rachel
11 Volkel?

12 A No.

13 Q Did any staff report ever seeing Mr. Ron Braaten
14 during that week in 1996?

15 A No.

16 MR. ARGENTO: Thank you.

17 MS. NAPPI: I just have one follow-up. I'm
18 sorry.

19 FURTHER EXAMINATION

20 BY MS. NAPPI:

21 Q If visitors attended the camp in 1996, were they
22 logged in any way?

23 A No.

24 Q Would employees of the camp be required to write
25 down or report a visitor at any point in 1996?

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1 A Yes.

2 Q What was the process for that?

3 A They would either come to the office themselves
4 and accompany the person to the office, or they would let
5 the office know that this visitor had arrived, but it was a
6 policy that visitors were to be accompanied to the office by
7 the staff member.

8 Q And if the visitors followed that policy, would
9 there be any record of the fact that they complied with the
10 camp's policy?

11 A No.

12 Q So as you sit here today, would you have any way
13 of verifying whether someone visited the camp or not?

14 A No.

15 MS. NAPPI: I have nothing further.

16 MR. ARGENTO: Anything else, Len?

17 MR. LESSER: Oh, no, not from me.

18 MR. ARGENTO: I think that's it.

19 MS. NAPPI: Thank you so much, Ms. Halliday. We
20 really appreciate it. I hope this was better than jury
21 duty today. Thank you for your time.

22 MR. ARGENTO: It wound up being shorter than I
23 thought it was going to be.

24 COURT REPORTER: Before everyone jumps off, could
25 I please get the order?

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1 MS. NAPPI: I ordered it. We're going to do stipes and
2 signs. So as long as we can get the transcript, I'm
3 going to forward it to Mr. Argento for his client to
4 review and sign.

5 (Whereupon, the deposition was concluded at
6 11:40 a.m.)

25

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CERTIFICATE

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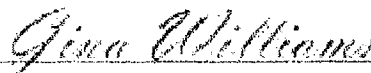
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I, Gina Williams, Registered Professional Court Reporter, do certify that the above deposition was reported by me and that the foregoing transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not an employee of counsel or any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

Subscribed and sworn to before me when taken this 29th day of August, 2022.



GINA WILLIAMS, RPR, CRR

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1 ACKNOWLEDGMENT OF DEPONENT

2
3 I, NANCY HALLIDAY, do hereby certify that I have
4 read the foregoing pages and that the same is a correct
5 transcription of the answers given by me to the questions
6 therein propounded, except for the corrections or changes in
7 form or substance, if any, noted in the attached Errata
8 Sheet.

11
12 NANCY HALLIDAY

Date

13
14 Subscribed and sworn to before me this

15 ____ day of ____, 2022.

16 My commission expires: ____

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19 Notary Public
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ERRATA

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